

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

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RAMIRO BASTIDAS (AND WIFE, ZOILA BASTIDAS)

07CV8278

Plaintiffs,

ANSWER

-against-

80 LAFAYETTE ASSOCIATES, LLC ALAN KASMAN
DBA KASCO, AMERICAN EXPRESSBANK, LTD,
AMERICAN EXPRESS TRAVELRELATED SERVICES
COMPANY, INC., ANN TAYLOR STORES
CORPORATION, B.R. FRIES & ASSOCAITES, INC.,
BANKERS TRUST COMPANY, BATTERY PARK
CITY AUTHORITY, BFP ONE LIBERTY PLAZA
CO., LLC., BFP TOWER C CO. LLC., BFP TOWER C
CO. LLC., BFP TOWER C MM LLC., BLACKMON-
MOORING-STEAMATIC CATASTOPHE, INC. D/B/A
BMS CAT, BLUE MILLENNIUM REALTY LLC,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC., BT PRIVATE
CLIENTS CORP., CDL NEW YORK LLC, CENTURY 21,
INC., DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, ENVIROTECH CLEAN AIR,
INC., GENERAL RE SERVICES CORP., GPS
ENVIRONMENTAL CONSULTANTS, INC.,
GRUBB & ELLIS MANAGEMENT SERVICES,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
INDOOR ENVIRONMENTAL TECHNOLOGY,
INC., KASCO RESTORATION SERVICES CO.,
LEHMAN BROTHERS HOLDINGS INC.,
LEHMAN BROTHERS, INC., LEHMAN
COMMERCIAL PAPER, INC., MAYORE
ESTATES LLC, MAYORE ESTATES LLC
AND 80 LAFAYETTE ASSOCIATION LLC
AS TENANTS IN COMMON, MCCLER
CORPORATION, MERRILL LYNCH & CO,

INC., NATIONAL ASSOCIATION OF
SECURITIES DEALERS, INC., NEW
LIBERTY PLAZA LP, NEW YORK CITY
INDUSTRIAL DEVELOPMENT AGENCY,
NEW YORK CITY INDUSTRIAL
DEVELOPMENT CORPORATION,
NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL,
INC., ONE LIBERTY PLAZA, STONER AND
COMPANY, INC., STRUCTURE TONE (UK),
INC., STRUCTURE TONE GLOBAL
SERVICES, INC., THE BANK OF NEW YORK
TRUST COMPANY NA, THE BOARD OF
MANAGERS OF THE ONE LIBERTY
PLAZA CONDOMINIUM (CONDO #1178), THE
ONE LIBERTY PLAZA CONDOMINIUM
(CONDO #1178), TISHMAN INTERIORS
CORPORATION, TOSCORP INC., TRAMMELL
CROW COMPANY, TRAMMELL CROW
CORPORATE SERVICES, INC., TUCKER
ANTHONY, INC., TULLY CONSTRUCTION
CO., INC., TULLY INDUSTRIES, INC,
VERIZON NEW YORK INC, WESTON
SOLUTIONS, INC., WFP ONE LIBERTY PLAZA
CO., L.P., WFP RETAIL CO. G.P. CORP., WFP
RETAIL CO. L.P., WFP TOWER A CO., WFP
TOWER A CO. G.P. CORP., WFP TOWER A. CO.,
L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER
B HOLDING CO., LP, WFP TOWER B. CO., L.P.,
AND WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. (“Envirotech”), as and for their responses to the allegations set forth in the Complaint by Adoption (“Check-off Complaint”) related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech’s Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
January 22, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY: 
Heather L. Smar (4622)